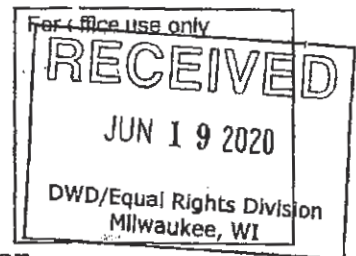


Discrimination Complaint
Wisconsin Fair Employment Law
Wis. Stat. §§ 111.31-111.395

ERD Case #
CR



Authorization for this form is provided under Wis. Stat. § 111.39(1).

Personal information you provide may be used for secondary purposes [Privacy Law, Wis. Stat. § 15.04(1)(m)].

READ instructions on page two FIRST then type or print in black ink.

1. Complainant Information

2. Respondent Information

First Name Jasmine		
Middle Initial S		
Last Name Oliver		
Street Address/PO Box 8221 W Oklahoma Ave Apt 3		
City Milwaukee	State WI	Zip Code 53219
Telephone Number (414) 840-1505		
E-Mail Address mugsoliverjasmine@gmail.com		

The company, agency, or union you believe discriminated against you. Name only ONE Respondent per form. Do not name an individual person as Respondent.		
Name Amazon.com Services Inc.		
Street Address/PO Box 3501 120th Ave		
City Kenosha	State WI	Zip Code 53144
Telephone Number (262) 859-0001		
In what Wisconsin county did the violation take place? Kenosha		

3. CHECK ONLY THE BOXES THAT WERE THE REASON FOR DISCRIMINATION

If you checked a box with an *, the statement in that box **must** be completed.

I believe the Respondent discriminated or took action against me **because**

<input type="checkbox"/> of my race * which is _____	<input type="checkbox"/> of my age (40 or older) * my date of birth is _____	<input type="checkbox"/> of my marital status * which is _____
<input type="checkbox"/> of my color * which is _____	<input type="checkbox"/> of my conviction record	<input type="checkbox"/> of my military service
<input type="checkbox"/> of my national origin/ancestry * which is _____	<input type="checkbox"/> of my arrest record	<input type="checkbox"/> of my use or nonuse of lawful products
<input checked="" type="checkbox"/> of my sex *Perceived which is Transgender	<input type="checkbox"/> of my sexual orientation * which is _____	<input type="checkbox"/> of genetic testing
<input type="checkbox"/> of my pregnancy or maternity	<input type="checkbox"/> of my creed (religion) * which is _____	<input type="checkbox"/> of polygraph testing
<input checked="" type="checkbox"/> of my disability * which is PTSD/ Anxiety	<input type="checkbox"/> I declined to attend a meeting or to participate in a communication about religious matters or political matters.	<input checked="" type="checkbox"/> I filed a previous discrimination complaint with Equal Rights or testified or assisted with a discrimination complaint. Enter Case # CR201902057 #CR201903138
<input checked="" type="checkbox"/> I opposed discrimination in the workplace (refer to instruction 2(c) on page 2 of this form)		
<input type="checkbox"/> The Respondent printed or circulated, advertised or published a discriminatory statement	<input type="checkbox"/> The Respondent used a discriminatory application or made a discriminatory inquiry about prospective employment	

4. Dates of discrimination (Required; estimate if unsure)

Date the discrimination began? mm/dd/yyyy 01/30/2020	Date of the most recent discrimination? mm/dd/yyyy 06/18/2020
<input checked="" type="checkbox"/> My employment was terminated on 06/18/2020 (if applicable)	

This form covers discriminatory actions alleged under §§ 111.322(1), (2), and (3) of the Wisconsin Fair Employment Law. Discriminatory actions alleged under § 111.322(2m) must be filed using form ERD-1835B, "Retaliation Complaint."

5. Statement of discrimination:

Write a brief, concise statement explaining how you were discriminated against. Give the date each action occurred and the name of the person who took the action. Explain how each action(s) was related to the box (es) you checked in section #3 on page one.

On August 28, 2019, I filed a corrected complaint with the Division. ERD Case Number CR201902057.

On October 3, 2019, the Division mailed a notice of my complaint to the Respondent. In addition, I filed another complaint on January 24th, 2020. ERD Case Number CR201903138.

I have been a Warehouse Associate with the Respondent since November 6, 2018 and terminated on June 18th, 2020.

On Friday March 13th, 2020, I experienced sexual harassment when Tommie, an associate at Amazon, made unwelcomed advances, which persisted for the remainder of my shift. At approximately 11:40, Tommie made several advances even after I mentioned that I am not interested because I'm not available. He also showed me a graphic picture of him without a shirt on and I told him that he's doing way too much. He began groping me, by rubbing my upper and lower back and also grabbed both my shoulders. As a sexual assault survivor I became afraid of appearing weak, in fear that the behavior would continue and escalate. Tommie became persistent to discover the time that I would be leaving work, which made my PTSD symptoms worse.

On March 14th, 2020 I filed a report of sexual harassment to an anonymous employee ethics portal and to the Kenosha Police Department. I attended a meeting with HR Business Partner Tyrell, Loss Prevention and four local Police Officers concerning my disability of PTSD/ Anxiety, both harassment and sexual harassment. Tyrell did not conduct a follow up meeting after the officers referenced that it was a viable claim of sexual harassment.

Shortly after I reported sexual harassment I received a termination notice. During my absence of employment, I struggled with an increase of symptoms such as Depression, Anxiety and PTSD. I was afraid that I would suffer further retaliation once I returned to work.

On May 11th, 2020 The respondent scheduled me near Davina, which is one of the harassers mentioned in my previous complaints, even after having knowledge of my triggers concerning PTSD.

On May 15th, 2020 Tommie continued to harass me even after filing a complaint. The respondent had knowledge that I had been sexually assaulted in the past and took no remedial action to ensure that Tommie stopped harassing me.

On May 18th, 2020 Marissa, an associate at Amazon, mentioned that she wanted to meet me outside after an altercation concerning her being upset that I was walking too slow for her liking. I immediately reported the incident to William and Ben, the security guards, who heard and had knowledge of the incident and did nothing to assist me during, or after the incident. As I returned from my vehicle Marissa approached me and wanted to know where I had been because she wanted me to meet her outside and threatened me, by stating that she wanted to fight.

On May 24th, 2020, Marissa threatened me once again, by saying that she wanted to fight. Feeling unsafe and suffering from PTSD I did not take the threat, or harassment well and persisted to defend myself after being provoked. I've requested certain accommodations in the past concerning my disorder and my mood, as well as attempting to involve security by reporting what had now become harassment. After noticing that my safety was disregarded, I perceived her threat to be serious and the encounter with Marissa escalated. I have a disorder, which causes my mind to process threats of violence at a higher velocity than someone without

a disorder, which is why I reported the incident. My past experiences with harassment, triggers my disorder, which I've attempted to avoid; however, due to the nature of the continuous threats of violence I was unable to control my symptoms. My disorder affects my ability to process threats of violence, my mood, and behavior when faced with a trigger. Marissa began recording me on her phone, while I encountered symptoms of my disorder, which is an anger outburst. Management as well as staff witnessed the event. If the respondent would have accommodated me these events would not have occurred.

For the past year, I've made multiple attempts for an accommodation and consistently made an effort to control my symptoms despite the habitual provoking of my triggers, which the respondent has knowledge of.

Later during the same shift, I met with HR and recanted the events surrounding the triggering of my symptoms and expressed that I reported harassment and received no follow up. I did not feel comfortable making a written statement due to the respondent altering my personnel records. I informed Tafashia, the human resource representative, that I would be filing a complaint with the division because I made a complaint of an associate threatening me and there wasn't any follow up, leaving me to defend myself. I expressed that I have a disorder, which causes me to process threats at a higher degree than the average person and that I could become rather aggressive when triggered. Tafashia had knowledge that I had been harassed(threatened with physical violence on multiple occasions by the same associate), that I did my due diligence by reporting the incident, informed her of my disability and that I would be filing another complaint for failing to take remedial action. The respondent refused to accommodate me and did not engage in any interactive process after I disclosed my disability with Tafashia on May 24th, 2020. I expressed that I believed my disability and intentions to file a complaint motivated the respondent to suspend me seeing that the other associate was not placed on suspension after threatening me on multiple occasions. I work in an environment where it has become acceptable to trigger my known disability, to threaten, and sexually harass me to the point where it has affected my mental health and employment. I did not feel that my safety, or rights as an employee were regarded as important, which caused me to display symptoms of hypervigilance and anger. If the event itself was the cause of my suspension the decision would have been made after a full investigation was conducted. The harasser was not faced with a suspension, which led me to believe that the cause of my suspension was because I expressed that I would be filing another complaint. A proper investigation would have shown that I reported the incident that caused me to become symptomatic. I do not believe that I should have encountered an adverse employment action after disclosing my disability and intention to file a complaint.

After being on suspension between May 22nd, 2020 and June 18th, 2020 I was terminated for failure to comply with workplace rules and policy. However, I believe that my statutory activity played a major factor in this decision because others who have done similar acts were not punished as harsh. For an example, Kimberly Nash and Rachel Delacruz had a disagreement and threats were exchanged and both employees were placed on opposite ends of the department. Both employees were not sent to hr, both employees were not placed on a suspension and both employees remained employed.

Other employees who have been in similar situations regarding policy were a labor shared employee who violated policy by harassing me was not suspended, or terminated. This same employee was never questioned concerning him violating policy by sexually harassing me and cursing at me for not giving into his advances.

Tommie Lee Robinson was not suspended, or terminated after violating policy by groping me and continued to harass me even after the incident.

Kimberly, and Davina were never suspended, or terminated for violating policy, which is knowingly repeating false information regarding another employee and harassing based on my perceived sexual orientation.

During my employment I was sexually harassed, harassed based on my perceived sexual orientation, retaliated against by management, discriminated against by management, verbally abused, mentally abused, and physically abused and all employees remained employed because they did not oppose discrimination or

engage in statutorily protected activities and I believed I was treated differently because of the following reasons listed above.

6. Certification and Signature

By my signature below, I certify that I have read the above complaint, and, under penalties of law, I declare that this complaint is true and correct to the best of my knowledge and belief. I understand that this complaint is an open record and may be provided to the employer or others under the provisions of Wisconsin's Open Records Law.

Signature of Complainant or authorized representative

Date signed

6/18/2020

Jasmine Oliver

Please complete Equal Rights Process Information Sheet on Page 4